

1 Bill Robins III, Esq. (SBN 296101)
2 Robert T. Bryson, Esq. (SBN 156953)
3 Rex Grady, Esq. (SBN 232236)
4 **ROBINS CLOUD LLP**
5 808 Wilshire Blvd., Suite 450
6 Santa Monica, California 90401
7 Telephone: (310) 929-4200
8 Facsimile: (310) 566-5900

9 Attorneys for Creditor, Nicholas Panella

10 Matthew W. Grimshaw, Esq. (SBN 210424)
11 **GRIMSHAW LAW GROUP, P.C.**
12 26 Executive Park, Ste. 250
13 Irvine, California 92614
14 Telephone: (949) 734-0187
15 Facsimile: (208) 391-7860

16 Counsel for Robins Cloud LLP

11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 In re) Case No. 19-30088 (DM)
15 PG&E CORPORATION,)
16) Chapter 11
17 and)
18 PACIFIC GAS AND ELECTRIC) (Lead Case–Jointly Administered)
19 COMPANY)
20 Debtors) **DECLARATION OF ROBERT**
21) **BRYSON IN SUPPORT OF MOTION**
22) **FOR ORDER AUTHORIZING**
23) **WITHDRAWAL OF COUNSEL TO**
24) **NICHOLAS PANELLA**

25 Affects:

- 26 ☐ PG&E Corporation)
27 ☐ Pacific Gas & Electric Company)
28 ☒ Both Debtors)

29 * All papers shall be filed in the Lead)
30 Case, No. 19-30088 (DM).)
31)

1 **Declaration of Robert Bryson**

2 I, Robert Bryson, say and declare as follows:

3 1. I am an individual over 18 years of age and competent to make this declaration.

4 2. I am an attorney with the law firm of Robins Cloud LP (the "Firm"), attorneys of
5 record for Nicholas Panella ("Creditor").¹ I am duly admitted to practice law before all courts of
6 the State of California and before this court.

7 3. I make this declaration in support of the Firm's motion to be relieved as counsel
8 to Creditor in the above-captioned bankruptcy case ("Motion"). The facts set forth below are true
9 and within the scope of my personal knowledge, and if called upon to do so I could and would
10 testify competently to these facts.

11 4. On January 29, 2019, Debtors filed voluntary petitions commencing their
12 bankruptcy cases.

13 5. On December 27, 2019, the Firm filed Proof of Claim No. 91754 on behalf of
14 Nicholas Panella ("Claim"), seeking damages from the North Bay Fires. Since the filing of the
15 Claims, an irreconcilable difference has developed between Creditor and the Firm. As a result,
16 the Firm notified Creditor that it must withdraw as counsel.

17 6. To the extent that Creditor requests that the Firm turn over any files or
18 information that he is entitled to, the Firm will cooperate and transmit such files.


19 7. The Firm will cause the Motion to be served on all of the addresses provided to
20 the Firm by Creditor, including the following:

21 314 2nd Street
22 Healdsburg, CA 95448

P.O. Box 2914
Rohnert Park, CA 94927

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on February 16, 2022.

25 
26 Robert Bryson

27
28 ¹ The Firm retained Grimshaw Law Group, P.C. ("GLG") to, among other things, assist it in filing this motion. GLG has no contractual or attorney/client relationship with Creditor.